

**HALPERIN BATTAGLIA RAICHT, LLP**

555 Madison Avenue, 9<sup>th</sup> Floor  
New York, New York 10022  
(212) 765-9100  
(212)765-0964 Facsimile  
Donna Lieberman, Esq.  
Carrie E. Mitchell, Esq.

**COLE, SCHOTZ, MEISEL,  
FORMAN & LEONARD, P.A.**

A Professional Corporation  
Court Plaza North  
25 Main Street, P. O. Box 800  
Hackensack, New Jersey 07602-0800  
(201) 489-3000  
(201) 489-1536 Facsimile  
Ilana Volkov, Esq.

Co-Counsel for the Class 10 Liquidation Trust

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In the Matter of:	:	UNITED STATES BANKRUPTCY COURT
	:	FOR THE DISTRICT OF NEW JERSEY
	:	HONORABLE GLORIA M. BURNS
SHAPES/ARCH HOLDINGS, L.L.C., <i>et al.</i> ,	:	CASE NO. 08-14631(GMB)
	:	
Debtors.	:	
	:	Chapter 11
	:	
	:	<b>NOTICE OF MOTION OF THE CLASS 10</b>
	:	<b>LIQUIDATION TRUST FOR AN ORDER</b>
	:	<b>GRANTING A FURTHER EXTENSION OF</b>
	:	<b>TIME TO FILE OBJECTIONS TO INSIDER</b>
	:	<b>CLAIMS AND TO ASSERT OBJECTIONS</b>
	:	<b>UNDER § 502(d) OF THE BANKRUPTCY</b>
	:	<b>CODE</b>

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HEARING DATE AND TIME:  
December 14, 2009, at 10:00 a.m.

**ORAL ARGUMENT WAIVED UNLESS  
OBJECTIONS TIMELY FILED**

TO: All Parties-in-Interest

**PLEASE TAKE NOTICE** that on December 14, 2009, at 10:00 a.m., or as soon thereafter as counsel may be heard, the undersigned, attorneys for the Class 10 Liquidation Trust, shall move before the Honorable Gloria M. Burns, United States Bankruptcy Judge, at the United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4<sup>th</sup> Floor, Camden, New Jersey 08101, for entry of an Order granting a further extension of time to file objections to insider claims and to assert objections under § 502(d) of the Bankruptcy Code (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that in support of the Motion, the undersigned shall rely on the accompanying Application, which sets forth the relevant factual and legal bases upon which the requested relief should be granted. A proposed Order granting the requested relief also is submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the relief requested in the Motion shall: (i) be in writing, (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents dated March 27, 2002 (the “General Order”) and the Commentary Supplementing Administrative Procedures dated as of March 2004 (the “Supplemental Commentary”) (the General Order, the Supplemental Commentary and the User’s Manual for the Electronic Case Filing System can be found at [www.njb.uscourts.gov](http://www.njb.uscourts.gov), the official website for the Bankruptcy Court) and, by all other parties-in-interest, on CD-ROM in Portable Document Format (PDF), and shall be served in accordance with the General Order and the Supplemental Commentary, so as to be received no later than seven (7) days before the hearing date set forth above.

**PLEASE TAKE FURTHER NOTICE** that unless objections are timely filed, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a), and the relief requested may be granted without further notice or hearing.

**PLEASE TAKE FURTHER NOTICE** that the undersigned does not request oral argument unless objections are timely filed.

Respectfully submitted,

**HALPERIN BATTAGLIA RAICHT, LLP**  
Co-Counsel for the Class 10 Liquidation Trust

By: /s/ Donna H. Lieberman  
Donna H. Lieberman  
Carrie E. Mitchell

**COLE, SCHOTZ, MEISEL,  
FORMAN & LEONARD, P.A.**  
Co-Counsel for the Class 10 Liquidation Trust

By: /s/ Ilana Volkov  
Ilana Volkov

DATED: November 23, 2009